

**Public Comments received through 11/2/2018 on pasogcp.com
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Name	Chapter & Section	Comment	GSA	Date/Time	Attachment(s)
Verna Jigour	Ch. 1 Introduction to Paso Robles Subbasin Groundwater Sustainability Plan 1.2 Description of Paso Robles Subbasin	<p>I advise expanding the text and figure 1.1 to include the watersheds/catchments feeding the pertinent subbasins. I realize that SGMA does not require planning outside the basins of concern but, especially in the case of the Paso Robles Subbasin, opportunities to augment groundwater recharge and storage will be left out of the equation if planning is confined solely to the basins. GSA stakeholders correctly identified potential watershed approaches at the third GSP informational meeting May 14, 2018, according to the documented results of the Projects and Management Actions Rotating Group Stations. Following are pertinent excerpts: Despite that Station 1 was titled In-Basin Supply Projects some of the documented suggestions do, in fact, consider the broader watershed context, as follows: "Ideas from the small groups related to in-Basin water supply projects: Slow down flows in Salinas River Optimize Salinas River recharge Incentive-based recharge Improve local stream recharge Recharge on floodplains (with environmental benefit) Forest management Recharge above the basin/higher up in basinStation 2 Out of Basin Supply Projects Ideas from the small groups related to out-of-Basin water supply projects: Watershed restoration projects " Management " Restore after fires/reseed with native vegetation Study Salinas Watershed at headwaters for potentialStation 4 Conservation MeasuresIdeas from the small groups related to conservation measures: Watershed management Forest management Promote healthy soils (pastures, root crops), carbon farming While this especially pertains to CHAPTER 9. Projects and Management Actions, Chapter 1 sets the stage for all subsequent chapters, does it not? If Chapter 1 considers solely the basins, projects and management actions relevant to the watersheds/ catchments will be left out.I consider it a mistaken artifact of reductionism that SGMA dictates apply solely to the (alluvial) groundwater basins [sinks], considering that those basins are actually fed by their respective watersheds/ catchments [source]. Alas, this reductionistic paradigm, one of several documented in the Alternate Paradigms section of my website, has dominated water resources thinking for most of the past century but that was not always the case. Excerpts from the Proceedings of a Conference of Governors in the White House, Washington, D.C., convened by President Theodore Roosevelt in 1908, shared in my third blog post, How Watersheds Relate to Groundwater, demonstrate that livestock managers of that era correctly recognized that the forests and vegetation serve the same purpose as artificial reservoirs, made by dams or otherwise. They were similarly attuned to the minimum flow a.k.a. baseflow as a measure of watershed health. I offer additional details and links in the file attachments to my comments, but suffice it to state here that the approach proposed on my Rainfall to Groundwater website, based on my doctoral dissertation, Watershed Restoration for Baseflow Augmentation [Jigour 2008 (2011)], abstract attached, is literally tailor-made for the Paso Robles Subbasin GSP Chapter 11. Projects and Management. The Paso Robles Subbasin is the poster child for the Rainfall to Groundwater Approach. I only hope the GSAs will avail themselves of this nearly singular opportunity to restore watershed/catchment functions for groundwater sustainability, including restoration of steelhead habitats among other ecological benefits.</p>		10/15/2018 21:58	Jigour *2018-RainfalltoGroundwater GSP Process Comments.pdf
Sheila Lyons	Ch. 1 Introduction to Paso Robles Subbasin Groundwater Sustainability Plan 1.2 Description of Paso Robles Subbasin	<p>Please read on as this comment does apply to Chapter 1. Chapter 3, Figure 3-14 Indicates current Land Use Planning subareas. There needs to be an additional Figure indicating the PR Groundwater Basin Subareas such the one from Fugro, 2002 Basin Boundary showing subareas of the Basin. This can be found on the front page of the June 10, 2015 report "Achieving Sustainability in the PR Groundwater Basin. If not in this section, the Basin subarea map from Fugro needs to be included in the GSP somewhere....Chapter #1? This is important....land use planning areas are significantly different from basin planning areas. They have different characteristics and land use planning areas would be inappropriate for basin management. Creston participated early on in meetings for setting voluntary Basin Management Objectives and we are clear that the Creston Sub-Area has different management objectives from other parts of the basin due to our location (leading head of much of the recharge water going into the aquifer). We were much more aggressive and conservative about what course of action we think needs to be implemented to obtain basin sustainability. We believe the Creston Sub-area must be considered separate from the El Pomar-Estrella Land Use Planning Area because they are very different from one another and have very different management requirements.</p>	County of San Luis Obispo GSA	9/22/2018 14:40	
Verna Jigour	Ch. 2 Agencies' Information 2.1 Agencies' Names and Mailing Addresses	<p>Change to include watersheds/ catchments feeding the subbasins as noted for Chapter 1.</p>		10/15/2018 21:58	Jigour *2018-RainfalltoGroundwater GSP Process Comments.pdf
Sheila Lyons	Ch. 3 Description of Plan Area 3.1 Paso Robles Subbasin Introduction	<p>CAB voted at our Oct 17th meeting to echo the sentiments of the public present at the Oct. 8, 2018 Workshop held in Creston, that Creston is unique and should not be lumped in with El Pomar, Estrella, or any other part of the PR Basin, but should be considered a sub-area unto itself. Our hydrology is different and our view on basin management is more conservative than other areas of the basin.</p>	County of San Luis Obispo GSA	10/20/2018 9:27	
Verna Jigour	Ch. 3 Description of Plan Area 3.1 Paso Robles Subbasin Introduction	<p>This GSP covers the entire Paso Robles Subbasin.This GSP covers the entire watershed/ catchment area feeding the Paso Robles Subbasin.Figure 3-1: Area Covered by GSP:Change to include watershed/ catchment area.</p>		10/15/2018 21:58	Jigour *2018-RainfalltoGroundwater GSP Process Comments.pdf
Sheila Lyons	Ch. 3 Description of Plan Area 3.10 Land Use Plans	<p>Figure 3-14 Indicates current Land Use Planning subareas. There needs to be an additional Figure indicating the PR Groundwater Basin Subareas such the one from Fugro, 2002 Basin Boundary showing subareas of the Basin. This can be found on the front page of the June 10, 2015 report "Achieving Sustainability in the PR Groundwater Basin. If not in this section, the Basin subarea map from Fugro needs to be included in the GSP somewhere....Chapter #1? This is important....land use planning areas are significantly different from basin planning areas. They have different characteristics and land use planning areas would be inappropriate for basin management. Creston participated early on in meetings for setting voluntary Basin Management Objectives and we are clear that the Creston Sub-Area has different management objectives from other parts of the basin due to our location (leading head of much of the recharge water going into the aquifer).We were much more aggressive and conservative about what course of action we think needs to be implemented to obtain basin sustainability. We believe the Creston Sub-area must be considered separate from the El Pomar-Estrella Land Use Planning Area because they are very different from one another and have very different management requirements.</p>	County of San Luis Obispo GSA	9/22/2018 14:40	
Verna Jigour	Ch. 3 Description of Plan Area 3.4 Land Use	<p>3.4.2 WATER USE SECTORS Please correct the following patently incorrect statement: Native vegetation. This is the largest water use sector in the Subbasin by land area.This sector includes rural residential areas. Again, this largest water use sector is dominated by nonnative annual grasslands., as stated above.Figure 3-6: Water Use SectorsPlease correct the erroneous label stating Native Vegetation</p>		10/15/2018 21:58	Jigour *2018-RainfalltoGroundwater GSP Process Comments.pdf

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Verna Jigour	Ch. 3 Description of Plan Area 3.4 Land Use	The following statement is flat-out incorrect: The balance of the approximately 438,000 acres in the GSP Plan Area is largely native vegetation and could include dry farmed land. Surely the County of San Luis Obispo has its own Geographic Information System (GIS) it can use to test the veracity of the above claim. The GSP should not rely on erroneous information, even if it comes from DWR. My own past GIS work with landcover layers derived from the California Gap Analysis (explained in greater detail in my accompanying file attachment) showed me that a vast proportion of what I then referred to as upper Salinas River watershed is clothed with nonnative annual grasslands. While DWR may have referred to these lands as native vegetation they certainly not known for their discernment of vegetation types. The Land Use section should include at least a summary of historical and prehistorical (Native American) land use to fully establish the environmental setting of human cause changes in vegetative land cover. For example, the charcoal industry is known to have thrived later in SLO County than in many other regions of California. Historical removal of native oaks used in the charcoal should ideally be mapped to correlate historical changes to watershed land cover. The spatial locations of other documented impacts on native vegetation (and its watershed/ catchment functions), such as those mid- 20th Century state-sanctioned projects aimed at removing woody vegetation for rangeland improvement summarized in my blog post, Ball and Chain & Other Links, should be mapped. Historical impacts for which spatial documentation may not be forthcoming should at least be considered as part of the planning process.		10/15/2018 21:58	Jigour *2018-RainfalltoGroundwater GSP Process Comments.pdf
Sheila Lyons	Ch. 3 Description of Plan Area 3.4 Land Use	Section 3.4.2 and Figure 3-6, of the same name "Water Use Sectors" show the distribution of sectors but there is no table or text with the actual numbers by acres for each of these sectors, nor is there any estimate of their usage. Perhaps the second part (usage) of this will come in later chapters but the first (acreage) should be shown here.	County of San Luis Obispo GSA	9/22/2018 15:40	
Sheila Lyons	Ch. 3 Description of Plan Area 3.4 Land Use	Table 3-1 Land Use Summary - data from DWR 2014 is obviously out of date. Much has changed since. The SLO Department of Agriculture surely has more recent data (see there annual reports). An update of current info should be done. We believe there are closer to 40,000 or more acres in vineyards today.	County of San Luis Obispo GSA	9/22/2018 14:40	
Sheila Lyons	Ch. 3 Description of Plan Area 3.5 Existing Well Types, Numbers, and Density	CAB recently submitted a comment regarding Table 3-2 Wells over the Basin stating that we didn't believe the numbers shown in this table. We have since located an Excel file provided to CAB from the SLO PW Dept in recent months showing that there are 3945 production wells over the PR Basin. This indicates that there are many more wells than the Table 3-2 of the Chapter 3 draft of the GSP would suggest. See attached file.	County of San Luis Obispo GSA	9/30/2018 8:51	Copy of WELLS_PRGWB.xlsx
Sheila Lyons	Ch. 3 Description of Plan Area 3.5 Existing Well Types, Numbers, and Density	Table 3-2 Types of Wells - data appears to be entirely too low. CAB members believe this number should be revisited with numbers acquired from our Public Works department rather than DWR data.. 99 productions wells is way too low. We know there are 200 wineries in North County, admittedly all are not over the PR Basin, but many are. Windfall Farms which is here is Creston has around 6 wells alone that are production wells.	County of San Luis Obispo GSA	9/22/2018 14:40	
Sheila Lyons	Ch. 3 Description of Plan Area 3.6 Existing Monitoring Programs	Section 3.6.4 Climate Monitoring Table 3-4 Average Month Climate Summary Avg of 2010-2017 If this data is to be used for any calculations going forward the more important number would be the slope of the line for the average increase in monthly temperatures over time. Fixed numbers are not really useful for predicting future events. Or, at a minimum if this is a "for information only" section, the rate of temperature increases should be calculated and included as part of this section.	County of San Luis Obispo GSA	9/22/2018 14:40	
Dennis Loucks	Ch. 3 Description of Plan Area 3.4 Land Use	See attachment regarding Chapter 3.4 Land Use -- specifically Table 3-1, Land Use Summary. Notes: Comment uploaded by consultant via scanned hard copy. Because physical address is required to submit form, address for Dennis Loucks was found online posted in the SAN LUIS OBISPO LOCAL AGENCY FORMATION COMMISSION MEETING MINUTES FOR THURSDAY September 17, 2015. Therefore, address may be dated or incorrect. Because comment was uploaded by consultant, and the interested party's email address was not known to the consultant, the email address provided with this form belongs to uploading party.	County of San Luis Obispo GSA	9/30/2018 16:30	20180725_Loucks.pdf
Laurie Gage, District Administrator		The Board of Directors of the Estrella-El Pomar-Creston Water District has reviewed Chapter 1 and concluded that it has no comments on this chapter at this time. Individual Board directors may choose to personally comment on this chapter separately and independently from the Board as a whole.	City of Paso Robles GSA	10/11/2018 20:59	
Laurie Gage, District Administrator		The Board of Directors of the Estrella-El Pomar-Creston Water District has reviewed Chapter 2 and concluded that it has no comments on this chapter at this time. Individual Board directors may choose to personally comment on this chapter separately and independently from the Board as a whole.	City of Paso Robles GSA	10/11/2018 20:59	
Laurie Gage, District Administrator		The Board of Directors of the Estrella-El Pomar-Creston Water District has reviewed Chapter 3 and concluded that it has no comments on this chapter at this time. Individual Board directors may choose to personally comment on this chapter separately and independently from the Board as a whole.	City of Paso Robles GSA	10/11/2018 20:59	
Frederick Hoey		These comments relate to Figure 3-14: North County Planning Subareas: I object to the El Pomar-Estrella-Sub Area as defined. Interestingly, this Sub Area is startlingly similar to the boundaries of the "area of influence" of the Estrella-El Pomar-Creston Water District as defined by SLO-LAFCO. I expect this harmony is deliberate. The Creston area is distinctly different from both the El Pomar and Estrella area; accordingly, actions that are appropriate and necessary for the El Pomar and Estrella areas will not be appropriate for Creston. For instance within the Estrella areas a significant "cone of depression" has been created by the egregious groundwater pumping by the City of Paso Robles, which has been compounded by the local concentrations of large vineyard operations. Many Creston landowners have long been concerned that Creston groundwater would ultimately be utilized to remedy the damage that has been done to the Estrella groundwater levels. By combining three geographic areas, each with their own unique issues, into a Planning Sub Area, the authors of Chapter 3 wrongly assumed that the citizens of Creston would not rise up in strong opposition to such blatant, potential piracy of our water resources to cover the sins of the City of Paso Robles through the exploitation of the Estrella area. I strongly urge that the Creston area be identified as a separate Planning Sub Area, a view shared by all of my Creston friends and connections.	County of San Luis Obispo GSA	10/6/2018 16:03	

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Sheila Lyons		<p>In reading the notes from various PR Basin Cooperative Committee meetings we don't see anywhere that the local Citizen's Advisory Councils are included for receiving notices or communications. Additionally in those lists we have seen all entities listed have specific addresses by which the organizations or agencies may be noticed, however, Rural Residents are simply called out as Rural Residents. It seems greatly amiss to us that Rural Residents who are the great majority of the people living over the Paso Basin and who will be impacted the very most are not being communicated with directly. At the very least all Citizen Advisory Councils over the Basin should be noticed. Please add the Creston Advisory Body (CAB) to your contact lists. All notices may be sent directly to our chairperson, Sheila Lyons, (removed)</p>	County of San Luis Obispo GSA	9/22/2018 14:47	